

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

**DECLARATION OF AMELIA DIAZ
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN ORDER TO SHOW CAUSE WHY
DEFENDANT RUDOLPH W. GIULIANI SHOULD NOT BE HELD IN CONTEMPT
FOR FAILING TO COMPLY WITH THE TURNOVER ORDERS**

I, Amelia Diaz, a law clerk working for Willkie Farr & Gallagher LLP, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I work under the supervision of counsel to Plaintiffs-Receivers Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.
2. On the morning of Monday December 16, 2024, I traveled to a storage facility in Richmond Hill, NY ("Plaintiffs-Receivers' Facility") to review the items delivered by Mr. Giuliani on December 13, 2024 (the "Delivered Property").
3. Upon arrival at Plaintiffs-Receivers' Facility, I observed that the Delivered Property was securely stored. I also observed that none of the Delivered Property present at Plaintiffs-Receivers' Facility appeared to be damaged in any way.
4. The Delivered Property consisted of around 40 items of various furniture, clothing,
- 5 items of sports memorabilia, pictures, bedding, a television, and other miscellaneous items.

5. In reviewing the Delivered Property, I utilized the annotated CTS Packing List provided by counsel for Giuliani on December 6, 2024, see Declaration of Aaron E. Nathan ¶ 14, Ex. 9, the items listed in the Court's Turnover Order, see ECF No. 62 at 16–18, and the publicly available photos of the New York City Apartment published online, see StreetEasy, <https://streeteasy.com/building/45-east-66-th-street-building/10w> (last visited Dec. 17, 2024).

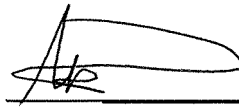
6. In reviewing the Delivered Property, I was unable to locate or identify several items of Receivership Property that Mr. Giuliani was required to turnover pursuant to the Court's Turnover Order (ECF No. 62), Instructions Order (ECF No. 94), and Modified Instructions Order (ECF No. 148), including: the signed Joe DiMaggio shirt; the signed Reggie Jackson picture; the signed Yankee Stadium Picture; the remaining watches (1 Shinola watch, 1 Corium watch, 1 IWC watch, 1 Invicta watch, 2 Breitling watches, 3 additional watches); and costume jewelry.

7. In addition, I was also unable to locate or identify other various items subject to turnover, including: any deed, title, or right of ownership to the Mercedes, or the keys; and stock, proprietary lease, or any of the underlying ownership documents for the New York City Apartment.

8. Finally, I was also unable to locate or identify the vast majority of the Receivership Property items that are visible in publicly available photographs of the interior of Mr. Giuliani's New York Apartment published on July 26, 2023, including without limitation: the black Eames chair, dining tables, lamps with stained glass lampshades, various other furniture, and various vases, paintings, and wall decorations. *See* StreetEasy, <https://streeteasy.com/building/45-east-66-th-street-building/10w> (last visited Dec. 17, 2024).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 18, 2024.

A handwritten signature in black ink, appearing to be 'Adiaz', is written over a solid horizontal line.

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*Law Clerk Under Supervision of Counsel for
Ruby Freeman and Wandrea' Moss*